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IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
JACOB JACOBSEN,  
  
Defendant.

CASE NO. 1:22-cr-00304-ADA-BAM

VIOLATIONS: 18 U.S.C. §§ 2251(a) and (e) – Sexual  
Exploitation of Children and Attempt (Four Counts); 18  
U.S.C. § 2252(a) (2) – Receipt of a Visual Depiction of a  
Minor Engaged in Sexually Explicit Conduct; 18 U.S.C. §  
2253 - Criminal Forfeiture

I N D I C T M E N T

COUNT ONE: [18 U.S.C. §§ 2251(a) and (e) – Sexual Exploitation of Children and Attempt]

The Grand Jury charges: T H A T

JACOB JACOBSEN,  
defendant herein, beginning no later than September 2020 and continuing through approximately September  
2022, in Stanislaus County, within the State and Eastern District of California, and elsewhere, knowingly  
employed, used, persuaded, induced, enticed, and coerced a minor (Minor Victim 1) to engage in any  
sexually explicit conduct for the purpose of producing any visual depiction of such conduct, and for the  
purpose of transmitting a live visual depiction of such conduct, knowing and having reason to know that the  
visual depiction would be transported or transmitted using any means or facility of interstate or foreign  
commerce, and in or affecting interstate or foreign commerce, and the visual depiction was produced or  
transmitted using materials that had been mailed, shipped, or transported in or affecting interstate or foreign

commerce by any means, including by computer, and attempted to do so, all in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT TWO: [18 U.S.C. §§ 2251(a) and (e) – Sexual Exploitation of Children and Attempt]

The Grand Jury further charges: T H A T

JACOB JACOBSEN,

defendant herein, beginning no later than July 2020 and continuing through approximately October 2022, in Stanislaus County, within the State and Eastern District of California, and elsewhere, knowingly employed, used, persuaded, induced, enticed, and coerced a minor (Minor Victim 2) to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct, and for the purpose of transmitting a live visual depiction of such conduct, knowing and having reason to know that the visual depiction would be transported or transmitted using any means or facility of interstate or foreign commerce, and in or affecting interstate or foreign commerce, and the visual depiction was produced or transmitted using materials that had been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer, and attempted to do so, all in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT THREE: [18 U.S.C. §§ 2251(a) and (e) – Sexual Exploitation of Children and Attempt]

The Grand Jury further charges: T H A T

JACOB JACOBSEN,

defendant herein, in September 2020, in Stanislaus County, within the State and Eastern District of California, and elsewhere, knowingly employed, used, persuaded, induced, enticed, and coerced a minor (Minor Victim 3) to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct, and for the purpose of transmitting a live visual depiction of such conduct, knowing and having reason to know that the visual depiction would be transported or transmitted using any means or facility of interstate or foreign commerce, and in or affecting interstate or foreign commerce, and the visual depiction was produced or transmitted using materials that had been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer, and attempted to do so, all in violation of Title 18, United States Code, Sections 2251(a) and (e).

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1 COUNT FOUR: [18 U.S.C. §§ 2251(a) and (e) – Sexual Exploitation of Children and Attempt]

2 The Grand Jury further charges: T H A T

3 JACOB JACOBSEN,

4 defendant herein, in July 2020, in Stanislaus County, within the State and Eastern District of California, and  
5 elsewhere, knowingly employed, used, persuaded, induced, enticed, and coerced a minor (Minor Victim 4) to  
6 engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct,  
7 and for the purpose of transmitting a live visual depiction of such conduct, knowing and having reason to  
8 know that the visual depiction would be transported or transmitted using any means or facility of interstate or  
9 foreign commerce, and in or affecting interstate or foreign commerce, and the visual depiction was produced  
10 or transmitted using materials that had been mailed, shipped, or transported in or affecting interstate or  
11 foreign commerce by any means, including by computer, and attempted to do so, all in violation of Title 18,  
12 United States Code, Sections 2251(a) and (e).

13 COUNT FIVE: [18 U.S.C. § 2252(a)(2) – Receipt of a Visual Depiction of a Minor Engaged in Sexually  
14 Explicit Conduct]

15 The Grand Jury further charges: T H A T

16 JACOB JACOBSEN,

17 defendant herein, beginning no later than September 2017, and continuing through September 28, 2022, in  
18 Stanislaus County within the State and Eastern District of California, and elsewhere, did knowingly receive  
19 at least one visual depiction, the producing of which involved at least one minor engaging in sexually explicit  
20 conduct and which depiction was of such conduct, as defined in Title 18, United States Code, Section 2256,  
21 which depiction had been transported in interstate or foreign commerce, had been sent or received using any  
22 means or facility of interstate or foreign commerce, or which contained materials which had been mailed,  
23 shipped, or transported in interstate or foreign commerce by any means, including by computer, all in  
24 violation of Title 18, United States Code, Section 2252(a)(2).

25 FORFEITURE ALLEGATION: [18 U.S.C. § 2253(a) - Criminal Forfeiture]

26 1. Upon conviction of one or more of the offenses alleged in Counts One through Five of this  
27 Indictment, defendant JACOB JACOBSEN, shall forfeit to the United States pursuant to 18 U.S.C. §  
28 2253(a), any and all matter which contains visual depictions produced, transported, mailed, shipped or

received in violation thereof; any property, real or personal, constituting or traceable to gross profits or other proceeds the defendant obtained as a result of said violations; and any property, real or personal, used or intended to be used to commit and promote the commission of such violations, including but not limited to the following:

- (a) Blue Apple iPhone 12, Model A2342, IMEI 3567131103035347, manufactured in China;
- (b) Black Apple iPhone 7, Model A1784, IMEI 359216071614860, manufactured in China;
- (c) Apple iPad, Model: A1954, manufactured in China
- (d) Black Acer Laptop, Model Q5WPH, serial number B0BAE857, manufactured in Taiwan
- (e) Seagate 2TB Hard Drive, Model ST20000DM001, serial number W2406218, manufactured in China
- (f) Seagate Hard Drive, Model ST2000DM008, serial number ZFL2D8EG, manufactured in Singapore; and a
- (g) Chronos 120 gigabyte Hard Drive, Model MKNSSDCR, serial number 7/MK1606301001FBEE5, assembled in Mexico

2. If any property subject to forfeiture as a result of the offenses alleged in Counts One through Five of this Indictment, for which defendant is convicted:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States pursuant to 18 U.S.C. § 2253(b) and 28 U.S.C. § 2461(c), incorporating

1 Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant,  
2 up to the value of the property subject to forfeiture.

3 A TRUE BILL.

4 /s/ Signature on file w/AUSA

5  
6 FOREPERSON

7  
8 PHILLIP A. TALBERT  
9 United States Attorney

10 **KIRK E. SHERRIFF**

11 **KIRK E. SHERRIFF**  
12 Assistant United States Attorney,  
13 Chief, Fresno Office  
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